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**From:** Marsh, Karen [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=03408BEA5D5B4030BE80FA390ED47026-MARSH, KARE]  
**Sent:** 4/23/2018 2:35:24 PM  
**To:** Richard Verreydt [Ex: 6 Personal Privacy (PP)]@gmail.com]  
**Subject:** RE: OOOOa Regulations

Hi Richard,

The amendments were finalized and made effective on March 12, 2018, upon publication in the Federal Register.

Therefore, facilities (well sites or compressor stations) are no longer required to complete repairs that have been delayed during unscheduled or emergency shutdowns, such as compressor station shutdowns, vent blowdowns, well shutdowns, or well shut ins. Additionally, well sites located on the Alaskan North Slope have separate monitoring requirements from well sites located elsewhere. Specifically, a new or modified well site located on the Alaskan North Slope must complete initial monitoring within 6 months or by June 30<sup>th</sup>, whichever is later if it starts up production between September and March. If it starts up production between April and August, the initial monitoring must be completed within 60-days of startup of production. From that point, the well site is subject to annual monitoring. All other requirements related to the fugitive program (monitoring plan, repair deadlines, recordkeeping, and reporting) remain the same as they were in the 2016 final rule.

Please let me know if you have any additional questions.

Karen

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**From:** Richard Verreydt [mailto:[Ex: 6 Personal Privacy (PP)]@gmail.com]  
**Sent:** Wednesday, April 18, 2018 7:23 PM  
**To:** Marsh, Karen <Marsh.Karen@epa.gov>  
**Subject:** OOOOa Regulations

Hello Karen,

I wonder if you could clarify a couple of questions for me please. Is the regulatory guidance supporting OOOOa leak detection in (or) pending 'Stay' status or is the document full and final. The document I'm referring to is;

<https://www.federalregister.gov/documents/2018/03/12/2018-04431/oil-and-natural-gas-sector-emission-standards-for-new-reconstructed-and-modified-sources-amendments>

Relative to the Alaskan North Slope, could you clarify the formal (full and final) Government position on the following two provisions;

(1) The requirement that delayed repairs must be completed during unscheduled or emergency vent blowdowns that occur within the 2-year repair timeframe and prior to other scheduled event;

(2) the monitoring survey requirements for well sites located on the Alaskan North Slope - namely, the full and final requirement for performing OOOOa inspections (particularly in the prolonged Alaskan cold weather). I'm unclear as to whether a 'Stay' remains in place to this provision or is the approved full and final requirement for **one** inspection annually as a result of the cold weather?

Many thanks for a quick response, have a nice day Karen!

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Regards

Richard